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VIA ELECTRONIC FILING

David Butler, Esquire

Public Service Commission of South Carolina

101 Executive Center Drive

Columbia, SC 29210

RE: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans

Docket No. 2017-207-E; Docket No. 2017-305-E; and Docket No. 2017-370-E

Dear Mr. Butler:

In Order No. 2018-114-H, the determination was made that “five (5) minutes per party per opening statement is deemed to be a reasonable time for those parties wishing to provide limited opening statements....” In Ms. Edwards’ request seeking additional time to make ORS’s opening statement, she sought and received permission for another party to give its time to ORS, thereby enlarging ORS’s time to make its opening statement. As you are aware, there are 17 other parties in this case, and all of those parties have taken positions adverse to the positions advanced by SCE&G and Dominion Energy. Together, these 17 parties have among them a total of 85 minutes to make opening statements, while SCE&G and Dominion Energy have a total of 10 minutes or five minutes each. This friendly and unilateral grant to ORS of Ms. Teague’s time to make an opening statement perhaps forecasts the friendly cooperation that will occur in awarding time by individual parties and those with more limited interest to major parties such as ORS. This grant of time perhaps also forecasts that there may be on the horizon cooperation among ORS and the intervening parties for friendly cross examination to address issues that are perhaps not as developed in their written prefiled testimony as they would like. The Hearing Officer has cautioned

(continued...)

all parties against such activities, but this grant of time to ORS forecasts that such issues may have to be addressed during the hearing of this case. That said, and while we are hopeful that friendly cross examination will not be used as an excuse to avoid a party's responsibility to prefile its testimony in order to meet its burden of proof, the issue that we respectfully request the Hearing Officer address now is the prejudice and unfairness that SCE&G and Dominion Energy will experience if they are limited to 10 minutes for their opening while the opposing parties collectively have a total of 85 minutes. Consequently, we would respectfully request that Dominion Energy and SCE&G collectively be granted 50 percent of the time allotted to all adverse parties collectively, not to exceed a total of 30 minutes, to make opening statements. We of course would only use the time that is necessary, but fairness suggests that we at least be given one half of the time, not to exceed a total of 30 minutes, that the other parties have been allotted, especially when Dominion Energy and SCE&G have the burden of proof in the principal case of Docket No. 2017-370-E.

We therefore respectfully request that the Hearing Officer rule that SCE&G and Dominion Energy will have 50 percent of the time allotted to all other parties collectively, not to exceed 30 minutes, for the presentation of opening statements, and consistent with the Hearing Officer's previous ruling on the order of presentation, that SCE&G and Dominion Energy be permitted to make their opening statement last.

Thank you for your consideration of this request. If further information is needed, please do not hesitate to contact us. With warmest regards, I am

Sincerely,

WILLOUGHBY & HOEFER, P.A.

s/Mitchell Willoughby

Mitchell Willoughby

MW/lla

cc: All parties of record in Docket Nos. 2017-207-E; 2017-305-E; and 2017-370-E
(all via electronic mail only)